

EXHIBIT N

1 THE UNITED STATES DISTRICT COURT
2
3 WESTERN DISTRICT OF WASHINGTON AT TACOMA

4 CHAO CHEN, individually and) No. 3:17-cv-05769-RJB
5 on behalf of all those)
6 similarly situated,)
7 Plaintiff,)
8 v.)
9 THE GEO GROUP, INC., a)
10 Florida corporation,)
11 Defendant.)

12 VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
13 **NWAUZOR UGOCHUKWU**
14 June 19, 2018
15 Fircrest, Washington

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21
22
23 Taken Before:
24 Laura A. Gjuka, CCR #2057
25 Certified Shorthand Reporter

1 A P P E A R A N C E S

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12 For the Defendant:

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18 JOAN K. MELL
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22 Also Present:

23 MICHAEL HEHENKAMP
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1 EXAMINATION INDEX

2 EXAMINATION BY: PAGE NO.

3 Mr. Deacon 5

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5 EXHIBIT INDEX

6 (No exhibits marked for identification.)

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1 BE IT REMEMBERED that on the 19th of June,
2 2018, 9:11 a.m., at 1019 Regents Boulevard, Fircrest,
3 Washington, before LAURA A. GJUKA, CCR# 2057, Washington
4 State Certified Court Reporter residing at University
5 Place, authorized to administer oaths and affirmations
6 pursuant to RCW 5.28.010.

7 WHEREUPON the following proceedings were had,
8 to wit:

9 * * * *

18 Present for the plaintiff is Adam Berger. Present
19 for the defense and noticing the deposition is
20 Joan Mell. Also present is Charles Deacon. The witness
21 is Ugochukwu Nwauzor. The court reporter today is
22 Laura Gjuka who will now swear in the witness and
23 proceed with the deposition.

24 MR. DEACON: We have another appearance
25 here.

1 VIDEOGRAPHER: And also present is
2 Meena Menter.

3 MS. MELL: You do need to answer orally.

4 MR. DEACON: Do you agree to --

5 THE WITNESS: What?

6 MR. DEACON: You are sworn under oath to
7 tell the truth.

8 THE WITNESS: Yeah, I will swear on the
9 truth.

10 MR. BERGER: Yeah. You have to answer
11 orally and say, "I do."

12 THE WITNESS: I do.

13
14 UGOCHUKWU NWAUZOR, having been first duly sworn
15 by the Court Reporter, was
16 examined and testified as
17 follows:

18

19 EXAMINATION

20 BY MR. DEACON:

21 Q Mr. Goodluck, my name is Charlie Deacon, and I'm taking
22 your deposition here today because you have sued my
23 client, The GEO Group. Do you understand that?

24 A (Witness nods head.) Yeah.

25 Q You have to say yes or no.

1 A Yes, sir.

2 Q Okay. You understand that you have been designated as a
3 class representative in a class action lawsuit against
4 The GEO Group for your time at Northwest Detention
5 Center?

6 A Yeah.

7 MR. BERGER: And, Goodluck, if you could
8 just speak up --

9 THE WITNESS: Yeah.

10 MR. BERGER: -- to make it easier on the
11 court reporter --

12 THE WITNESS: Yeah.

13 MR. BERGER: -- and so the video captures
14 it. Thanks.

15 BY MR. DEACON:

16 Q Why are you suing my client?

17 A For the work I did for GEO.

18 Q The work you did?

19 A Yeah.

20 Q What work did you do for GEO?

21 A When I was in detention, I cleaned the shower.

22 Q Okay. You cleaned the shower?

23 A Yeah.

24 Q In your pod?

25 A Yeah. In my pod, yeah.

1 Q Okay. And how often did you clean the shower in your
2 pod?

3 A I clean it every day.

4 Q Okay. Every day you were there?

5 A Yeah, every day.

6 Q Okay. And how long did it take you to clean your
7 shower?

8 A One hour plus.

9 COURT REPORTER: Sorry?

10 THE WITNESS: One hour plus.

11 BY MR. DEACON:

12 Q One hour plus?

13 A Yeah.

14 Q Did you sign up to do that, to clean the shower?

15 A Yeah, I signed up.

16 Q Okay. And was that part of a voluntary work program?

17 A (Unintelligible).

18 COURT REPORTER: I'm sorry?

19 THE WITNESS: It's not (unintelligible)
20 program.

21 COURT REPORTER: I didn't understand you,
22 I'm sorry. "It's not..."

23 THE WITNESS: It's voluntary work.

24 BY MR. DEACON:

25 Q Oh, so this was just the housekeeping policy?

1 Q Was there somebody working with you to clean the
2 showers --

3 A No --

4 Q -- or did you do it by yourself?

5 A -- by myself.

6 Q Okay. Did someone clean them in the morning too?

7 A Yeah. Other people clean the morning; some clean in the
8 night.

9 Q Okay.

10 A Yeah.

11 Q Okay. So the showers were cleaned three times a day?

12 A I know that I clean -- let me just be upfront. Mine is
13 afternoon.

14 Q Okay.

15 A Other people do their own job on their own time.

16 Q Okay. But did you see that the showers were also
17 cleaned in the morning?

18 A In the morning?

19 Q Yes.

20 A I clean afternoon, then other people clean in the
21 evening.

22 Q Okay. So you cleaned in the afternoon, but somebody
23 else cleaned the same showers in the evening?

24 A The evening?

25 Q Yes.

1 A Yeah. Excuse me, I made a mistake. I clean in the
2 afternoon.

3 Q Right.

4 A Other people clean in the night. After the shower might
5 be used in the night, I'm the one that's going to clean
6 it the next day. Nobody clean in the morning.

7 Q Nobody clean in the morning?

8 A Nobody clean in the morning.

9 Q Okay. So they were cleaned in the afternoon and at
10 night?

11 A In the afternoon. Because in the morning, when I --
12 when they clean in the night, it's going to be -- it's
13 going to be cleaned in the morning for people to use.
14 Then after people using it, I'm the one going to clean
15 it.

16 Q Okay.

17 A Yeah.

18 Q All right. So tell me, how would you clean the showers?
19 what did you do?

20 A Yeah. I use -- there is one rubber -- you take
21 chemical, you know. Take a chemical and mop. There is
22 1, 2, 3, 4, like, five segments, different, different
23 rooms for shower. Then I use the chemical and the
24 rubber, mop the wall. You know, clean the ground. You
25 know, a lot of -- when people use, a lot of mess. You

1 see a lot of things which I cannot, you know -- you
2 know, a lot of mess in there.

3 Q So you would clean that -- clean up whatever is in the
4 shower?

5 A Yeah.

6 Q Okay. Did -- did you do anything other than cleaning
7 showers?

8 A My job is clean the shower.

9 Q Okay.

10 A Yeah. And also I have other people who work in the
11 kitchen, work in the barbershop. That one is outside
12 the pod.

13 Q You were inside the pod?

14 A I work inside the pod.

15 Q Okay. You did not work in the kitchen?

16 A I didn't work in the kitchen.

17 Q You did not work in the barbershop?

18 A No, I didn't work in the barbershop. I didn't work in
19 the laundry.

20 Q You did not work in the laundry?

21 A Yeah, I have other people work in other areas.

22 Q Okay. Just to make sure, you did not work in the
23 laundry?

24 A Yeah, they work in the laundry.

25 Q Okay. The only thing you did was clean the showers in

1 your pod in the afternoon for about an hour?

2 A Yeah.

3 Q Okay. No other jobs?

4 A That's my job.

5 Q So the entire time you were there, that's what you did?

6 A Yeah.

7 Q Was there any period of time from when you first went in
8 to orientation to the time you started -- before you
9 could -- you could start cleaning the showers?

10 A Excuse me?

11 Q Bad question. Let me -- did you have to wait for a job
12 to open?

13 A Yeah. This is the way. Sometime they going to bring
14 people there is job for. You guys, we need people in
15 laundry, we need people in kitchen, we need people in
16 different area of detention. Then we have instruction
17 we should come in and sign. I got my own in my pod.
18 The guy that was doing the job, I don't know whether
19 deported or I don't know, but he leave the job. Then
20 the opportunity come for me to grab it. That's how I
21 got the job.

22 Q Okay. So you grabbed the job because it became open?

23 A It's open. A lot of people got it through that way. Or
24 sometimes they bring the paper. You know, if you want
25 to work in the laundry, if you want to work in the

1 barbershop. I had as any opportunity, you know, start.

2 Q Okay. Did you sign up to work in the voluntary work
3 program more than once?

4 A Voluntary work? Yeah. we do sometimes voluntary work
5 in our pod. We do it. And the G-4 -- G-2 go and
6 investigate when I was there, we are the best, you know,
7 best apartment. Very neat and very conditioned.

8 Q So you kept -- the people in G-2 keep their pod nice and
9 clean?

10 A Yeah, we win a lot of gift.

11 Q Okay.

12 A Yeah.

13 Q So you were recognized for doing a good job keeping your
14 living area clean?

15 A That is general job. When we do voluntary job, it's
16 different from the -- the shower. Voluntary job, don't
17 do anything in shower.

18 Q Okay.

19 A We clean the whole area. You know, clean microwave,
20 clean the TV, you know, remove all the cob web in the --
21 you know, the entire area. The shower is different from
22 voluntary job.

23 Q So the people in G-2 took pride in keeping their living
24 space clean?

25 A Yeah. Also it's not every day that we done our job,

1 Saturday, yeah.

2 Q What other activities did you do when you were at
3 Northwest Detention Center?

4 A Not detention center I was -- not do anything other than
5 to read my Bible. Because I don't know what's going to
6 be my status because I was living in fear. I don't
7 know -- yeah.

8 Q You didn't -- you didn't know how long you would be
9 there?

10 A I don't know how long I'm going to be there.

11 Q Okay. Did you go use the recreation yard?

12 A Yeah. Yeah. I follow, you know, not every time. I go
13 outside, try to have sunlight, you know.

14 Q Get some exercise?

15 A Exercise, you know. Some play football outside there,
16 but I was afraid of doing all those things so I will not
17 injure myself.

18 Q Okay. Do you ever communicate with your family back in
19 Nigeria?

20 A Yeah.

21 Q How do you communicate with them?

22 A I use the -- it's a phone in the -- in the pod. Yeah.

23 Q Okay. So you were able to use a phone in the pod at
24 Northwest Detention Center to call your family --

25 A Yeah.

1 Q Okay.

2 A But a woman came -- I don't know they call it -- kind of
3 trying to know my problem about depression.

4 Q Uh-huh.

5 A It's not mental. I don't know.

6 Q Depression. That's what I'm talking about.

7 A Yeah, depression. A woman came. Because when you say
8 mental, I didn't have mental. You know, a woman came
9 for depression, you know. I met a lady.

10 Q Okay.

11 A Yeah.

12 Q Was the lady the only person that you ever got
13 counseling from when you were at Northwest Detention
14 Center?

15 A Yeah. She is the only one that's --

16 Q Okay.

17 A And the help of the church. The help of the church.

18 Q And the church too?

19 A Yeah, I talk to pastors.

20 Q All right. Did you -- when you talked to the pastors at
21 church, was that only on Sunday or did you go different
22 days of the week too?

23 A Some people go, you know, Saturdays, Sundays. I can't
24 remember the day we -- but I know Sunday -- Saturday or
25 Sunday I go to church in detention.

1 Center, did they provide you any medications to take for
2 your depression?

3 A No, it's --

4 Q Just talking?

5 A It's talk and they tell me what to do and some books to
6 read, you know.

7 Q Some books to read?

8 A Yeah.

9 Q Did you read those books?

10 A Yeah, there is one book I read. Also, I can't remember,
11 through some friends in the detention I borrowed in
12 library -- in our pod, we have some novels good to --
13 you know, to read when you're, like, feeling not okay.
14 Trying to get myself reading books.

15 Q Okay.

16 A Yeah.

17 Q So you had some books you could read right in your
18 living area?

19 A Yeah. We have a book, you know, box in detention.

20 Q You had books you could read there?

21 A Yeah.

22 Q Did you also go to the library to read some books?

23 A No, I don't go to library.

24 Q Okay. Did she give you a book to read then, the
25 counselor? You mentioned she told you a book to read.

1 Q what's that?

2 A I never dream for that, no.

3 Q Okay. Who showed you how to do the -- cleaning the
4 showers?

5 A The guy before me. I met the guy when he was working
6 there before me.

7 Q Okay. Because he was leaving, he was -- he showed you
8 how to do it?

9 A No, he is also working there. He is doing the same job.

10 Q oh, the guy who works the night?

11 A Are you talking about Marriott or -- I don't know what
12 you're talking about.

13 Q Okay. You took a job to clean the living area in your
14 own pod. Who showed you how to do that?

15 A In the detention?

16 Q Yes.

17 A Okay. A guy showed me.

18 Q Who?

19 A One guy showed me in the pod.

20 Q Was that the person who was already cleaning the
21 showers?

22 A I don't know, but the guy have the idea.

23 Q Okay.

24 A The guy have the idea. But I don't know if he had work,
25 have the experience before, but when -- when I took the

1 C E R T I F I C A T E

2 I, Laura Gjuka, a Certified Court Reporter in
3 and for the State of Washington, residing at
4 University Place, Washington, authorized to administer
5 oaths and affirmations pursuant to RCW 5.28.010, do
6 hereby certify;

7 That the foregoing Verbatim Report of Proceedings
8 was taken stenographically before me and transcribed
9 under my direction; that the transcript is a full, true
10 and complete transcript of the proceedings, including
11 all questions, objections, motions and exceptions;

12 That I am not a relative, employee, attorney or
13 counsel of any party to this action or relative or
14 employee of any such attorney or counsel, and that I am
15 not financially interested in the said action or the
16 outcome thereof;

17 That upon completion of signature, if required, the
18 original transcript will be securely sealed and the same
19 served upon the appropriate party.

20 IN WITNESS HEREOF, I have hereunto set my hand this
21 25th day of June, 2018.

22
23
24
25 _____
 Laura Gjuka, CCR No. 2057